

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

<b>ELLENOR ZINSKI,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. <u>6:24-cv-41-NKM</u></b>
	)	
<b>LIBERTY UNIVERSITY, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

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**DEFENDANT LIBERTY UNIVERSITY'S MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 12(b)(1) and (6), Defendant Liberty University, Inc. hereby moves the Court to dismiss the Complaint on the grounds that Plaintiff's claims are barred by Section 702 and 703 of Title VII of the Civil Rights Act, the First Amendment's ecclesiastical abstention doctrine, the Religious Freedom Restoration Act, 42 U.S.C. §2000bb-1, and the First Amendment's ministerial exception, and the First Amendment right of association. Liberty University's grounds for dismissal are more fully set forth in the accompanying Memorandum of Law in Support of Motion to Dismiss, filed simultaneously herewith.

Respectfully submitted,

/s/ Daniel J. Schmid  
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\*Pro hac vice admission forthcoming

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of October, 2024, I caused a true and correct copy of the foregoing to be electronically filed with this Court. Service will be effectuated on all counsel of record via this Court's ECF/electronic notification system.

/s/ Daniel J. Schmid

Daniel J. Schmid